

MEMO ENDORSED



THE CITY OF NEW YORK
LAW DEPARTMENT
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November 1, 2024

Via ECF

The Honorable Valerie E. Caproni
United States District Court for the
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Butler, et al. v. City of New York, et al., No. 15 CV 3783 (VEC)

Dear Judge Caproni:

I am an Assistant Corporation Counsel in the office of the Acting Corporation Counsel of the City of New York, Muriel Goode-Trufant, attorney for the Defendants in the above-referenced action. I write, with the consent of Plaintiffs' counsel, to respectfully request an additional one month for the parties to make an application to extend the Court's jurisdiction over certain portions of the November 17, 2017 Stipulation of Settlement, (ECF No. 67), in this action.

As the Court will recall, the Court's jurisdiction over several portions of the Stipulation has elapsed, but the parties have repeatedly stipulated to the Court's continuing jurisdiction over other portions, *i.e.*, beyond the Stipulation's originally envisioned termination date of December 7, 2022, to give Defendants additional time to comply with the terms of the Stipulation of Settlement. The present termination date of the extant portions of the Stipulation is thus December 7, 2024. (ECF No. 184, at p. 4.)

At present, while the parties agree the Court's jurisdiction should continue in some respect, the parties continue to discuss which provisions of the Stipulation of Settlement require ongoing monitoring by the Court. The parties require additional time for these discussions but anticipate resolving the remaining issues in the very near future. However, Paragraph 78 of the Stipulation requires a motion for an extension of the Court's jurisdiction be made thirty days before the operative termination date, *i.e.*, for present purposes, November 7, 2024. The requested 1-

month extension would move this deadline to December 7, 2024, allowing for more fruitful discussion between the parties in the meantime.

This is the Defendants' first request for an extension of the November 7, 2024 deadline. As noted, the requested 1-month extension would move the deadline to make an application to extend the Court's jurisdiction to December 7, 2024. As indicated, Plaintiffs' counsel has graciously consented to this application.

I thank the Court for its consideration of this matter.

Respectfully yours,

/s/ David S. Thayer

David S. Thayer

cc: *Via ECF*
All counsel of record

The deadline for the parties to seek an extension of the Court's jurisdiction is ADJOURNED to **Friday, December 6, 2024**.

SO ORDERED.

 11/4/2024

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE